

# **Exhibit B**

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Opulent Treasures, Inc.

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

OPULENT TREASURES, INC.,

Plaintiff,

v.

YA YA LOGISTICS, INC., et al.,

Defendants.

Case No. 2:22-cv-06137-SSS (JCx)

**OPULENT TREASURES, INC.'S  
RESPONSES TO YA YA  
LOGISTICS, INC.'S FIRST SET OF  
REQUESTS FOR PRODUCTION  
OF DOCUMENTS**

Action Filed in EDTX: August 17, 2021  
Action Transferred to CDCA: April 20,  
2022

YA YA LOGISTICS, INC.,

Counter-Plaintiff,

1 v.

2 OPULENT TREASURES, INC.,  
3 Counter-Defendant.

4 PROPOUNDING PARTY: PLAINTIFF YA YA LOGISTICS, INC.

5 RESPONDING PARTY: PLAINTIFF/COUNTER-DEFENDANT  
6 OPULENT TREASURES, INC.

7 SET NO.: ONE  
8

9 Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure (the  
10 “Federal Rules”) and the Local Rules of the United States District Court for the  
11 Central District of California (the “Local Rules”), Plaintiff and Counter-Defendant  
12 OPULENT CREATIONS, INC. (“Opulent”), by and through its undersigned  
13 counsel, hereby responds and objects to the First Set of Requests for Production of  
14 Documents (the “Requests”) propounded by Plaintiff YA YA LOGISTICS, INC.  
15 (“Ya Ya Logistics”) as follows:

16 **GENERAL OBJECTIONS**

17 1. Opulent’s discovery, internal investigation, and preparation for the trial  
18 of this matter is not completed as of the date of these Responses and are continuing.  
19 Opulent anticipates that discovery, internal investigation, and preparation for trial  
20 will reveal additional information not presently known to it, but upon which it may  
21 rely. These Responses to Ya Ya Logistics’ Requests are based upon information  
22 currently known or believed to be true by Opulent. Opulent reserves the right to  
23 modify or supplement its Responses upon completion of its discovery, internal  
24 investigation, and preparation for the trial of this matter, and to use at trial, or in any  
25 motion or deposition, any documents, facts, or supporting evidence of any sort later  
26 developed or discovered.

1           2.     Opulent objects to the Requests to the extent that it seeks to impose  
2 obligations in addition to those imposed by the Federal Rules of Civil Procedure, the  
3 Local Rules of the above-captioned court, any court order governing discovery in  
4 this case, or any discovery protocol agreed upon by the parties.

5           3.     Opulent objects to Propounding Party's Fifth Set of Requests for  
6 Production as overbroad, burdensome, and unwarranted.

7           4.     Opulent objects to the Requests to the extent that it seeks to elicit  
8 information that is neither relevant nor proportional to the needs of the case,  
9 considering the importance of the issues at stake in the action, the amount in  
10 controversy, the parties' relative access to relevant information, the parties'  
11 resources, the importance of the discovery in resolving the issues, and whether the  
12 burden or expense of the proposed discovery outweighs its likely benefit.

13          5.     Opulent objects to each Request to the extent that it purports to seek  
14 information protected by the attorney-client privilege or the work product doctrine,  
15 and Opulent will not provide any privileged and/or protected information. Any  
16 disclosure of privileged information would be inadvertent and should not be deemed  
17 a waiver of any privilege. To the extent that it has privileged documents responsive  
18 to the Requests below, Opulent will produce a privilege log.

19          6.     Opulent objects to each Request to the extent that it seeks information  
20 that is or may be confidential or information otherwise protected by any right of  
21 privacy. Such information will not be provided.

22          7.     Opulent objects to each Request to the extent that it seeks proprietary  
23 business information, trade secrets, or other confidential information. Such  
24 information will not be provided.

25          8.     Opulent objects to each Request to the extent that it seeks information  
26 from persons, companies, or entities other than Opulent. Opulent further objects to  
27 the extent each Request seeks information not within Opulent's custody, control, or  
28 possession or that is equally available to Ya Ya Logistics.

1 9. Opulent objects to each Request to the extent it does not specify dates  
2 and thus is overbroad and ambiguous.

3 10. Opulent objects generally to the Requests to the extent that they seek to  
4 have Opulent furnish information and identify documents that are a matter of the  
5 public record, and therefore, are equally available to Ya Ya Logistics.

6 11. Opulent objects to each Request to the extent that it contains words  
7 and/or phrases that are not defined, thereby rendering the Request overbroad, vague,  
8 and ambiguous.

9 12. Any responses to these Requests provided by Opulent are solely for the  
10 purpose of this litigation. Any attempt by Propounding Party or any other person or  
11 entity to use or disseminate the Responses, the information contained in the  
12 Responses, or the documents produced in this litigation beyond this litigation is  
13 objected to as improper and will be subject to appropriate action.

14 13. By these Responses, Opulent does not, and does not intend to:  
15 (1) waive any objections as to the admissibility of evidence or the competency of,  
16 relevancy of, materiality of, or privilege attaching to any information disclosed in  
17 these responses; or (2) waive the right to object to other discovery requests or  
18 undertakings involving or reflecting the subject matter requested herein. These  
19 Responses do not constitute, nor should they be construed as, admissions with  
20 respect to the relevancy or admissibility of any evidence or document identified  
21 herein or the truth or accuracy of any statement, characterization, or other  
22 information contained in such document. Opulent expressly does not concede the  
23 relevance or materiality of any of these responses or the subject matter to which they  
24 refer.

25 **OBJECTIONS TO DEFINITIONS**

26 1. Opulent objects to each “Definition,” and “Instruction” to the extent  
27 that any “Definition,” or “Instruction” seeks to impose obligations inconsistent with,  
28 beyond, or in addition to those imposed by the Federal Rules of Civil Procedure, the

1 Local Rules of the above-captioned Court, any Court order governing discovery in  
2 this case, or any discovery protocol agreed upon by the parties.

3 Without waiver of the foregoing, Opulent further responds as follows:

4 **RESPONSES TO REQUESTS FOR PRODUCTION OF DOCUMENTS**

5 **REQUEST FOR PRODUCTION NO. 1**

6 All DOCUMENTS and things that REFER or RELATE to YOUR conception  
7 and adoption of each of PLAINTIFF’S ALLEGED TRADE DRESS.

8 **RESPONSE TO REQUEST FOR PRODUCTION NO. 1**

9 Opulent objects to this request as overbroad and unduly burdensome,  
10 including with respect to scope and time period. Opulent objects to this request on  
11 the grounds that it is vague and ambiguous as to the terms “conception” and  
12 “adoption”. Opulent objects to this request to the extent that it seeks documents  
13 protected by attorney client privilege or is attorney work product. Opulent objects to  
14 this request to the extent it seeks irrelevant information. Opulent objects to this  
15 request to the extent that it seeks documents that are equally available to or are  
16 already in the custody, control, or possession of Ya Ya Logistics.

17 **REQUEST FOR PRODUCTION NO. 2**

18 All DOCUMENTS and things that REFER or RELATE to YOUR efforts to  
19 police any of PLAINTIFF’S ALLEGED TRADE DRESS against unauthorized  
20 third-party use.

21 **RESPONSE TO REQUEST FOR PRODUCTION NO. 2**

22 Opulent objects to this request as overbroad and unduly burdensome,  
23 including with respect to scope and time period. Opulent objects to this request on  
24 the grounds that it is vague and ambiguous as to the terms “efforts”, “police”,  
25 “unauthorized” and “third-party”. Opulent objects to this request to the extent that it  
26 seeks documents protected by attorney client privilege or is attorney work product.  
27 Opulent objects to this request to the extent it seeks irrelevant information. Opulent  
28

1 objects to this request to the extent that it seeks documents that are equally available  
2 to or are already in the custody, control, or possession of Ya Ya Logistics.

3 **REQUEST FOR PRODUCTION NO. 3**

4 All DOCUMENTS and things that REFER or RELATE to any expenses  
5 incurred by YOU with respect to the advertising, marketing or promotion of any  
6 goods or services under any of PLAINTIFF'S ALLEGED TRADE DRESS, from  
7 the date of first use of any of the PLAINTIFF'S ALLEGED TRADE DRESS to the  
8 present.

9 **RESPONSE TO REQUEST FOR PRODUCTION NO. 3**

10 Opulent objects to this request as overbroad and unduly burdensome,  
11 including with respect to scope. Opulent objects to this request on the grounds that it  
12 is vague and ambiguous as to the terms "expenses", "advertising", "marketing",  
13 "promotion", "goods" and "services". Opulent objects to this request to the extent  
14 that it seeks documents protected by attorney client privilege or is attorney work  
15 product. Opulent objects to this request to the extent it seeks irrelevant information.  
16 Opulent objects to this request to the extent that it seeks documents that are equally  
17 available to or are already in the custody, control, or possession of Ya Ya Logistics.

18 **REQUEST FOR PRODUCTION NO. 4**

19 All DOCUMENTS and things that REFER or RELATE to any instance in  
20 which any person has confused any goods or services of Defendant with any goods  
21 or services advertised, promoted, offered for sale or rendered under any trademark  
22 or service mark owned by PLAINTIFF.

23 **RESPONSE TO REQUEST FOR PRODUCTION NO. 4**

24 Opulent objects to this request as overbroad and unduly burdensome,  
25 including with respect to scope and time period. Opulent objects to this request on  
26 the grounds that it is vague and ambiguous as to the terms "confused", "advertised",  
27 "offered", "promoted", "goods", "services", "offered for sale" and "rendered".

28 Opulent objects to this request to the extent that it seeks documents protected by

1 attorney client privilege or is attorney work product. Opulent objects to this request  
2 to the extent it seeks irrelevant information. Opulent objects to this request to the  
3 extent that it seeks documents that are equally available to or are already in the  
4 custody, control, or possession of Ya Ya Logistics.

5 **REQUEST FOR PRODUCTION NO. 5**

6 All DOCUMENTS and things that REFER or RELATE to any instance in  
7 which any person has mistakenly believed that an association, sponsorship,  
8 affiliation or other relationship exists between YOU and DEFENDANT.

9 **RESPONSE TO REQUEST FOR PRODUCTION NO. 5**

10 Opulent objects to this request as overbroad and unduly burdensome,  
11 including with respect to scope and time period. Opulent objects to this request on  
12 the grounds that it is vague and ambiguous as to the phrases “mistakenly believed”,  
13 “association”, “sponsorship”, “affiliation” and “relationship”. Opulent objects to this  
14 request to the extent that it seeks documents protected by attorney client privilege or  
15 is attorney work product. Opulent objects to this request to the extent it seeks  
16 irrelevant information. Opulent objects to this request to the extent that it seeks  
17 documents that are equally available to or are already in the custody, control, or  
18 possession of Ya Ya Logistics.

19 **REQUEST FOR PRODUCTION NO. 6**

20 All DOCUMENTS and things that REFER or RELATE to the allegation that  
21 each trade dress of PLAINTIFF’S ALLEGED TRADE DRESS has obtained  
22 secondary meaning.

23 **RESPONSE TO REQUEST FOR PRODUCTION NO. 6**

24 Opulent objects to this request as overbroad and unduly burdensome,  
25 including with respect to scope and time period. Opulent objects to this request on  
26 the grounds that it is vague and ambiguous as to the phrases “trade dress” and  
27 “secondary meaning”. Opulent objects to this request to the extent that it seeks  
28 documents protected by attorney client privilege or is attorney work product.



1 Opulent objects to this request to the extent it seeks irrelevant information. Opulent  
2 objects to this request to the extent that it seeks documents that are equally available  
3 to or are already in the custody, control, or possession of Ya Ya Logistics.

4 **REQUEST FOR PRODUCTION NO. 7**

5 All DOCUMENTS and things that REFER or RELATE to any survey, study,  
6 poll, investigation or memorandum intended to determine whether each trade dress  
7 of PLAINTIFF’S ALLEGED TRADE DRESS has obtained secondary meaning.

8 **RESPONSE TO REQUEST FOR PRODUCTION NO. 7**

9 Opulent objects to this request as overbroad and unduly burdensome,  
10 including with respect to scope and time period. Opulent objects to this request on  
11 the grounds that it is vague and ambiguous as to the phrases “survey”, “study”, “poll  
12 investigation”, “memorandum”, “trade dress” and “secondary meaning”. Opulent  
13 objects to this request to the extent that it seeks documents protected by attorney  
14 client privilege or is attorney work product. Opulent objects to this request to the  
15 extent it seeks irrelevant information. Opulent objects to this request to the extent  
16 that it seeks documents that are equally available to or are already in the custody,  
17 control, or possession of Ya Ya Logistics.

18 **REQUEST FOR PRODUCTION NO. 8**

19 All DOCUMENTS and things that REFER or RELATE to any survey, study,  
20 poll investigation or memorandum intended to determine whether a likelihood of  
21 confusion exists between any of PLAINTIFF’S ALLEGED TRADE DRESS and  
22 any of DEFENDANT’s products or trademarks.

23 **RESPONSE TO REQUEST FOR PRODUCTION NO. 8**

24 Opulent objects to this request as overbroad and unduly burdensome,  
25 including with respect to scope and time period. Opulent objects to this request on  
26 the grounds that it is vague and ambiguous as to the phrases “survey”, “study”, “poll  
27 investigation”, “memorandum” and “confusion”. Opulent objects to this request to  
28 the extent that it seeks documents protected by attorney client privilege or is

1 attorney work product. Opulent objects to this request to the extent it seeks  
2 irrelevant information. Opulent objects to this request to the extent that it seeks  
3 documents that are equally available to or are already in the custody, control, or  
4 possession of Ya Ya Logistics.

5 **REQUEST FOR PRODUCTION NO. 9**

6 All DOCUMENTS and things which identify or relate to the actual and target  
7 demographics of the purchasers of YOUR goods and services.

8 **RESPONSE TO REQUEST FOR PRODUCTION NO. 9**

9 Opulent objects to this request as overbroad and unduly burdensome,  
10 including with respect to scope and time period. Opulent objects to this request on  
11 the grounds that it is vague and ambiguous as to the terms “things”, “actual” and  
12 “target”. Opulent objects to this request to the extent that it seeks documents  
13 protected by attorney client privilege or is attorney work product. Opulent objects to  
14 this request to the extent it seeks irrelevant information. Opulent objects to this  
15 request to the extent that it seeks documents that are equally available to or are  
16 already in the custody, control, or possession of Ya Ya Logistics.

17 **REQUEST FOR PRODUCTION NO. 10**

18 All DOCUMENTS and things that refer or relate to DEFENDANT or  
19 DEFENDANT’s accused products.

20 **RESPONSE TO REQUEST FOR PRODUCTION NO. 10**

21 Opulent objects to this request as overbroad and unduly burdensome,  
22 including with respect to scope and time period. Opulent objects to this request on  
23 the grounds that it is vague and ambiguous as to the term “things”. Opulent objects  
24 to this request to the extent that it seeks documents protected by attorney client  
25 privilege or is attorney work product. Opulent objects to this request to the extent it  
26 seeks irrelevant information. Opulent objects to this request to the extent that it  
27 seeks documents that are equally available to or are already in the custody, control,  
28 or possession of Ya Ya Logistics.

1 **REQUEST FOR PRODUCTION NO. 11**

2 DOCUMENTS and things sufficient to separately show YOUR sales of each  
3 of YOUR products bearing PLAINTIFF'S ALLEGED TRADE DRESS in the  
4 United States, by year.

5 **RESPONSE TO REQUEST FOR PRODUCTION NO. 11**

6 Opulent objects to this request as overbroad and unduly burdensome,  
7 including with respect to scope and time period. Opulent objects to this request on  
8 the grounds that it is vague and ambiguous as to the term "sufficient" and "sales".  
9 Opulent objects to this request to the extent that it seeks documents protected by  
10 attorney client privilege or is attorney work product. Opulent objects to this request  
11 to the extent it seeks irrelevant information. Opulent objects to this request to the  
12 extent that it seeks documents that are equally available to or are already in the  
13 custody, control, or possession of Ya Ya Logistics. Opulent objects to this request to  
14 the extent it seeks confidential or proprietary information.

15 **REQUEST FOR PRODUCTION NO. 12**

16 All DOCUMENTS and things that REFER or RELATE to the allegations in  
17 paragraph 16 of PLAINTIFF's First Amended Complaint.

18 **RESPONSE TO REQUEST FOR PRODUCTION NO. 12**

19 Opulent objects to this request as overbroad and unduly burdensome,  
20 including with respect to scope and time period. Opulent objects to this request on  
21 the grounds that it is vague and ambiguous as to the term "things". Opulent objects  
22 to this request to the extent that it seeks documents protected by attorney client  
23 privilege or is attorney work product. Opulent objects to this request to the extent it  
24 seeks irrelevant information. Opulent objects to this request to the extent that it  
25 seeks documents that are equally available to or are already in the custody, control,  
26 or possession of Ya Ya Logistics.

1 **REQUEST FOR PRODUCTION NO. 13**

2 All DOCUMENTS and things that REFER or RELATE to the allegations in  
3 paragraph 17 of PLAINTIFF's First Amended Complaint.

4 **RESPONSE TO REQUEST FOR PRODUCTION NO. 13**

5 Opulent objects to this request as overbroad and unduly burdensome,  
6 including with respect to scope and time period. Opulent objects to this request on  
7 the grounds that it is vague and ambiguous as to the term "things". Opulent objects  
8 to this request to the extent that it seeks documents protected by attorney client  
9 privilege or is attorney work product. Opulent objects to this request to the extent it  
10 seeks irrelevant information. Opulent objects to this request to the extent that it  
11 seeks documents that are equally available to or are already in the custody, control,  
12 or possession of Ya Ya Logistics.

13 **REQUEST FOR PRODUCTION NO. 14**

14 All DOCUMENTS and things that REFER or RELATE to the allegations in  
15 paragraph 20 of PLAINTIFF's First Amended Complaint.

16 **RESPONSE TO REQUEST FOR PRODUCTION NO. 14**

17 Opulent objects to this request as overbroad and unduly burdensome,  
18 including with respect to scope and time period. Opulent objects to this request on  
19 the grounds that it is vague and ambiguous as to the term "things". Opulent objects  
20 to this request to the extent that it seeks documents protected by attorney client  
21 privilege or is attorney work product. Opulent objects to this request to the extent it  
22 seeks irrelevant information. Opulent objects to this request to the extent that it  
23 seeks documents that are equally available to or are already in the custody, control,  
24 or possession of Ya Ya Logistics.

25 **REQUEST FOR PRODUCTION NO. 15**

26 All DOCUMENTS and things that REFER or RELATE to PLAINTIFF's  
27 allegation that "Opulent has acquired trade dress rights under the Lanham Act, as  
28 well as under state statutory and common law, in the overall look, design,

1 arrangement, and appearance of its cake stands and other decor items” in paragraph  
2 27 of PLAINTIFF’S First Amended Complaint.

3 **RESPONSE TO REQUEST FOR PRODUCTION NO. 15**

4 Opulent objects to this request as overbroad and unduly burdensome,  
5 including with respect to scope and time period. Opulent objects to this request on  
6 the grounds that it is vague and ambiguous as to the term “things”. Opulent objects  
7 to this request to the extent that it seeks documents protected by attorney client  
8 privilege or is attorney work product. Opulent objects to this request to the extent it  
9 seeks irrelevant information. Opulent objects to this request to the extent that it  
10 seeks documents that are equally available to or are already in the custody, control,  
11 or possession of Ya Ya Logistics.

12 **REQUEST FOR PRODUCTION NO. 16**

13 All DOCUMENTS and things that REFER or RELATE to PLAINTIFF’S  
14 allegations that “the key to Opulent’s success is the high quality and reputation of its  
15 products, which are closely associated by the public with Opulent’s Designs.  
16 Opulent has used Opulent’s Designs continuously as the main identifier of its  
17 elegant and distinct décor pieces” in paragraph 32 of PLAINTIFF’S First Amended  
18 Complaint.

19 **RESPONSE TO REQUEST FOR PRODUCTION NO. 16**

20 Opulent objects to this request as overbroad and unduly burdensome,  
21 including with respect to scope and time period. Opulent objects to this request on  
22 the grounds that it is vague and ambiguous as to the term “things”. Opulent objects  
23 to this request to the extent that it seeks documents protected by attorney client  
24 privilege or is attorney work product. Opulent objects to this request to the extent it  
25 seeks irrelevant information. Opulent objects to this request to the extent that it  
26 seeks documents that are equally available to or are already in the custody, control,  
27 or possession of Ya Ya Logistics.

1 **REQUEST FOR PRODUCTION NO. 17**

2 All DOCUMENTS and things that REFER or RELATE to PLAINTIFF's  
3 allegations that "in connection with marketing and selling Opulent's Designs,  
4 Plaintiff has extensively used, displayed, and advertised the non-functional features  
5 of the Opulent's Designs that comprise the trade dresses of said designs. In the  
6 minds of the public, the primary significance of these non-functional and distinctive  
7 features is to identify the source of the product, and Opulent Designs have acquired  
8 secondary meaning. The distinctive and nonfunctional features also identify that the  
9 product is reliable and of the high quality associated with Opulent" in paragraph 33  
10 of PLAINTIFF's First Amended Complaint.

11 **RESPONSE TO REQUEST FOR PRODUCTION NO. 17**

12 Opulent objects to this request as overbroad and unduly burdensome,  
13 including with respect to scope and time period. Opulent objects to this request on  
14 the grounds that it is vague and ambiguous as to the term "things". Opulent objects  
15 to this request to the extent that it seeks documents protected by attorney client  
16 privilege or is attorney work product. Opulent objects to this request to the extent it  
17 seeks irrelevant information. Opulent objects to this request to the extent that it  
18 seeks documents that are equally available to or are already in the custody, control,  
19 or possession of Ya Ya Logistics.

20 **REQUEST FOR PRODUCTION NO. 18**

21 All DOCUMENTS and things that REFER or RELATE to the allegations in  
22 paragraph 34 of PLAINTIFF's First Amended Complaint.

23 **RESPONSE TO REQUEST FOR PRODUCTION NO. 18**

24 Opulent objects to this request as overbroad and unduly burdensome,  
25 including with respect to scope and time period. Opulent objects to this request on  
26 the grounds that it is vague and ambiguous as to the term "things". Opulent objects  
27 to this request to the extent that it seeks documents protected by attorney client  
28 privilege or is attorney work product. Opulent objects to this request to the extent it

1 seeks irrelevant information. Opulent objects to this request to the extent that it  
2 seeks documents that are equally available to or are already in the custody, control,  
3 or possession of Ya Ya Logistics.

4 **REQUEST FOR PRODUCTION NO. 19**

5 All DOCUMENTS and things that REFER or RELATE to the allegations in  
6 paragraph 35 of PLAINTIFF's First Amended Complaint.

7 **RESPONSE TO REQUEST FOR PRODUCTION NO. 19**

8 Opulent objects to this request as overbroad and unduly burdensome,  
9 including with respect to scope and time period. Opulent objects to this request on  
10 the grounds that it is vague and ambiguous as to the term "things". Opulent objects  
11 to this request to the extent that it seeks documents protected by attorney client  
12 privilege or is attorney work product. Opulent objects to this request to the extent it  
13 seeks irrelevant information. Opulent objects to this request to the extent that it  
14 seeks documents that are equally available to or are already in the custody, control,  
15 or possession of Ya Ya Logistics.

16 **REQUEST FOR PRODUCTION NO. 20**

17 All DOCUMENTS and things that REFER or RELATE to the allegations in  
18 Paragraph 41 of PLAINTIFF's First Amended Complaint.

19 **RESPONSE TO REQUEST FOR PRODUCTION NO. 20**

20 Opulent objects to this request as overbroad and unduly burdensome,  
21 including with respect to scope and time period. Opulent objects to this request on  
22 the grounds that it is vague and ambiguous as to the term "things". Opulent objects  
23 to this request to the extent that it seeks documents protected by attorney client  
24 privilege or is attorney work product. Opulent objects to this request to the extent it  
25 seeks irrelevant information. Opulent objects to this request to the extent that it  
26 seeks documents that are equally available to or are already in the custody, control,  
27 or possession of Ya Ya Logistics.

28



1 **REQUEST FOR PRODUCTION NO. 21**

2 All DOCUMENTS and things that REFER or RELATE to the allegations in  
3 Paragraph 42 of PLAINTIFF's First Amended Complaint.

4 **RESPONSE TO REQUEST FOR PRODUCTION NO. 21**

5 Opulent objects to this request as overbroad and unduly burdensome,  
6 including with respect to scope and time period. Opulent objects to this request on  
7 the grounds that it is vague and ambiguous as to the term "things". Opulent objects  
8 to this request to the extent that it seeks documents protected by attorney client  
9 privilege or is attorney work product. Opulent objects to this request to the extent it  
10 seeks irrelevant information. Opulent objects to this request to the extent that it  
11 seeks documents that are equally available to or are already in the custody, control,  
12 or possession of Ya Ya Logistics.

13 **REQUEST FOR PRODUCTION NO. 22**

14 All DOCUMENTS and things that REFER or RELATE to the allegations in  
15 Paragraph 43 of PLAINTIFF's First Amended Complaint.

16 **RESPONSE TO REQUEST FOR PRODUCTION NO. 22**

17 Opulent objects to this request as overbroad and unduly burdensome,  
18 including with respect to scope and time period. Opulent objects to this request on  
19 the grounds that it is vague and ambiguous as to the term "things". Opulent objects  
20 to this request to the extent that it seeks documents protected by attorney client  
21 privilege or is attorney work product. Opulent objects to this request to the extent it  
22 seeks irrelevant information. Opulent objects to this request to the extent that it  
23 seeks documents that are equally available to or are already in the custody, control,  
24 or possession of Ya Ya Logistics.

25 **REQUEST FOR PRODUCTION NO. 23**

26 All DOCUMENTS and things that REFER or RELATE to the allegations in  
27 Paragraph 44 of PLAINTIFF's First Amended Complaint.

28



1 **RESPONSE TO REQUEST FOR PRODUCTION NO. 23**

2 Opulent objects to this request as overbroad and unduly burdensome,  
3 including with respect to scope and time period. Opulent objects to this request on  
4 the grounds that it is vague and ambiguous as to the term “things”. Opulent objects  
5 to this request to the extent that it seeks documents protected by attorney client  
6 privilege or is attorney work product. Opulent objects to this request to the extent it  
7 seeks irrelevant information. Opulent objects to this request to the extent that it  
8 seeks documents that are equally available to or are already in the custody, control,  
9 or possession of Ya Ya Logistics.

10 **REQUEST FOR PRODUCTION NO. 24**

11 All DOCUMENTS and things that REFER or RELATE to the allegations in  
12 Paragraph 45 of PLAINTIFF’s First Amended Complaint.

13 **RESPONSE TO REQUEST FOR PRODUCTION NO. 24**

14 Opulent objects to this request as overbroad and unduly burdensome,  
15 including with respect to scope and time period. Opulent objects to this request on  
16 the grounds that it is vague and ambiguous as to the term “things”. Opulent objects  
17 to this request to the extent that it seeks documents protected by attorney client  
18 privilege or is attorney work product. Opulent objects to this request to the extent it  
19 seeks irrelevant information. Opulent objects to this request to the extent that it  
20 seeks documents that are equally available to or are already in the custody, control,  
21 or possession of Ya Ya Logistics.

22 **REQUEST FOR PRODUCTION NO. 25**

23 All DOCUMENTS and things that REFER or RELATE to the allegations in  
24 Paragraph 46 of PLAINTIFF’s First Amended Complaint.

25 **RESPONSE TO REQUEST FOR PRODUCTION NO. 25**

26 Opulent objects to this request as overbroad and unduly burdensome,  
27 including with respect to scope and time period. Opulent objects to this request on  
28 the grounds that it is vague and ambiguous as to the term “things”. Opulent objects

1 to this request to the extent that it seeks documents protected by attorney client  
2 privilege or is attorney work product. Opulent objects to this request to the extent it  
3 seeks irrelevant information. Opulent objects to this request to the extent that it  
4 seeks documents that are equally available to or are already in the custody, control,  
5 or possession of Ya Ya Logistics.

6 **REQUEST FOR PRODUCTION NO. 26**

7 All DOCUMENTS and things that REFER or RELATE to the allegations in  
8 Paragraph 48 of PLAINTIFF's First Amended Complaint.

9 **RESPONSE TO REQUEST FOR PRODUCTION NO. 26**

10 Opulent objects to this request as overbroad and unduly burdensome,  
11 including with respect to scope and time period. Opulent objects to this request on  
12 the grounds that it is vague and ambiguous as to the term "things". Opulent objects  
13 to this request to the extent that it seeks documents protected by attorney client  
14 privilege or is attorney work product. Opulent objects to this request to the extent it  
15 seeks irrelevant information. Opulent objects to this request to the extent that it  
16 seeks documents that are equally available to or are already in the custody, control,  
17 or possession of Ya Ya Logistics.

18 **REQUEST FOR PRODUCTION NO. 27**

19 All DOCUMENTS and things that REFER or RELATE to the allegations in  
20 Paragraph 53 of PLAINTIFF's First Amended Complaint.

21 **RESPONSE TO REQUEST FOR PRODUCTION NO. 27**

22 Opulent objects to this request as overbroad and unduly burdensome,  
23 including with respect to scope and time period. Opulent objects to this request on  
24 the grounds that it is vague and ambiguous as to the term "things". Opulent objects  
25 to this request to the extent that it seeks documents protected by attorney client  
26 privilege or is attorney work product. Opulent objects to this request to the extent it  
27 seeks irrelevant information. Opulent objects to this request to the extent that it  
28 seeks documents that are equally available to or are already in the custody, control,

1 or possession of Ya Ya Logistics.

2 **REQUEST FOR PRODUCTION NO. 28**

3 All DOCUMENTS and things that REFER or RELATE to the allegations in  
4 Paragraph 54 of PLAINTIFF's First Amended Complaint.

5 **RESPONSE TO REQUEST FOR PRODUCTION NO. 28**

6 Opulent objects to this request as overbroad and unduly burdensome,  
7 including with respect to scope and time period. Opulent objects to this request on  
8 the grounds that it is vague and ambiguous as to the term "things". Opulent objects  
9 to this request to the extent that it seeks documents protected by attorney client  
10 privilege or is attorney work product. Opulent objects to this request to the extent it  
11 seeks irrelevant information. Opulent objects to this request to the extent that it  
12 seeks documents that are equally available to or are already in the custody, control,  
13 or possession of Ya Ya Logistics.

14 **REQUEST FOR PRODUCTION NO. 29**

15 All DOCUMENTS and things that REFER or RELATE to the allegations in  
16 Paragraph 62 of PLAINTIFF's First Amended Complaint.

17 **RESPONSE TO REQUEST FOR PRODUCTION NO. 29**

18 Opulent objects to this request as overbroad and unduly burdensome,  
19 including with respect to scope and time period. Opulent objects to this request on  
20 the grounds that it is vague and ambiguous as to the term "things". Opulent objects  
21 to this request to the extent that it seeks documents protected by attorney client  
22 privilege or is attorney work product. Opulent objects to this request to the extent it  
23 seeks irrelevant information. Opulent objects to this request to the extent that it  
24 seeks documents that are equally available to or are already in the custody, control,  
25 or possession of Ya Ya Logistics.

1 **REQUEST FOR PRODUCTION NO. 30**

2 All DOCUMENTS and things that REFER or RELATE to the allegations in  
3 Paragraph 63 of PLAINTIFF's First Amended Complaint.

4 **RESPONSE TO REQUEST FOR PRODUCTION NO. 30**

5 Opulent objects to this request as overbroad and unduly burdensome,  
6 including with respect to scope and time period. Opulent objects to this request on  
7 the grounds that it is vague and ambiguous as to the term "things". Opulent objects  
8 to this request to the extent that it seeks documents protected by attorney client  
9 privilege or is attorney work product. Opulent objects to this request to the extent it  
10 seeks irrelevant information. Opulent objects to this request to the extent that it  
11 seeks documents that are equally available to or are already in the custody, control,  
12 or possession of Ya Ya Logistics.

13 **REQUEST FOR PRODUCTION NO. 31**

14 All DOCUMENTS and things that REFER or RELATE to the allegations in  
15 Paragraph 67 of PLAINTIFF's First Amended Complaint.

16 **RESPONSE TO REQUEST FOR PRODUCTION NO. 31**

17 Opulent objects to this request as overbroad and unduly burdensome,  
18 including with respect to scope and time period. Opulent objects to this request on  
19 the grounds that it is vague and ambiguous as to the term "things". Opulent objects  
20 to this request to the extent that it seeks documents protected by attorney client  
21 privilege or is attorney work product. Opulent objects to this request to the extent it  
22 seeks irrelevant information. Opulent objects to this request to the extent that it  
23 seeks documents that are equally available to or are already in the custody, control,  
24 or possession of Ya Ya Logistics.

25 **REQUEST FOR PRODUCTION NO. 32**

26 All DOCUMENTS and things that REFER or RELATE to the allegations in  
27 Paragraph 74 of PLAINTIFF's First Amended Complaint.

28

1 **RESPONSE TO REQUEST FOR PRODUCTION NO. 32**

2 Opulent objects to this request as overbroad and unduly burdensome,  
3 including with respect to scope and time period. Opulent objects to this request on  
4 the grounds that it is vague and ambiguous as to the term “things”. Opulent objects  
5 to this request to the extent that it seeks documents protected by attorney client  
6 privilege or is attorney work product. Opulent objects to this request to the extent it  
7 seeks irrelevant information. Opulent objects to this request to the extent that it  
8 seeks documents that are equally available to or are already in the custody, control,  
9 or possession of Ya Ya Logistics.

10 **REQUEST FOR PRODUCTION NO. 33**

11 All DOCUMENTS and things that REFER or RELATE to the allegations in  
12 Paragraph 75 of PLAINTIFF’s First Amended Complaint.

13 **RESPONSE TO REQUEST FOR PRODUCTION NO. 33**

14 Opulent objects to this request as overbroad and unduly burdensome,  
15 including with respect to scope and time period. Opulent objects to this request on  
16 the grounds that it is vague and ambiguous as to the term “things”. Opulent objects  
17 to this request to the extent that it seeks documents protected by attorney client  
18 privilege or is attorney work product. Opulent objects to this request to the extent it  
19 seeks irrelevant information. Opulent objects to this request to the extent that it  
20 seeks documents that are equally available to or are already in the custody, control,  
21 or possession of Ya Ya Logistics.

22 **REQUEST FOR PRODUCTION NO. 34**

23 All DOCUMENTS and things that REFER or RELATE to the allegations in  
24 Paragraph 81 of PLAINTIFF’s First Amended Complaint.

25 **RESPONSE TO REQUEST FOR PRODUCTION NO. 34**

26 Opulent objects to this request as overbroad and unduly burdensome,  
27 including with respect to scope and time period. Opulent objects to this request on  
28 the grounds that it is vague and ambiguous as to the term “things”. Opulent objects

1 to this request to the extent that it seeks documents protected by attorney client  
2 privilege or is attorney work product. Opulent objects to this request to the extent it  
3 seeks irrelevant information. Opulent objects to this request to the extent that it  
4 seeks documents that are equally available to or are already in the custody, control,  
5 or possession of Ya Ya Logistics.

6 **REQUEST FOR PRODUCTION NO. 35**

7 All DOCUMENTS and things that REFER or RELATE to the allegations in  
8 Paragraph 82 of PLAINTIFF's First Amended Complaint.

9 **RESPONSE TO REQUEST FOR PRODUCTION NO. 35**

10 Opulent objects to this request as overbroad and unduly burdensome,  
11 including with respect to scope and time period. Opulent objects to this request on  
12 the grounds that it is vague and ambiguous as to the term "things". Opulent objects  
13 to this request to the extent that it seeks documents protected by attorney client  
14 privilege or is attorney work product. Opulent objects to this request to the extent it  
15 seeks irrelevant information. Opulent objects to this request to the extent that it  
16 seeks documents that are equally available to or are already in the custody, control,  
17 or possession of Ya Ya Logistics.

18 **REQUEST FOR PRODUCTION NO. 36**

19 All DOCUMENTS and things that REFER or RELATE to the allegations in  
20 Paragraph 85 of PLAINTIFF's First Amended Complaint.

21 **RESPONSE TO REQUEST FOR PRODUCTION NO. 36**

22 Opulent objects to this request as overbroad and unduly burdensome,  
23 including with respect to scope and time period. Opulent objects to this request on  
24 the grounds that it is vague and ambiguous as to the term "things". Opulent objects  
25 to this request to the extent that it seeks documents protected by attorney client  
26 privilege or is attorney work product. Opulent objects to this request to the extent it  
27 seeks irrelevant information. Opulent objects to this request to the extent that it  
28 seeks documents that are equally available to or are already in the custody, control,

1 or possession of Ya Ya Logistics.

2 **REQUEST FOR PRODUCTION NO. 37**

3 All DOCUMENTS and things that REFER or RELATE to the allegations in  
4 Paragraph 87 of PLAINTIFF's First Amended Complaint.

5 **RESPONSE TO REQUEST FOR PRODUCTION NO. 37**

6 Opulent objects to this request as overbroad and unduly burdensome,  
7 including with respect to scope and time period. Opulent objects to this request on  
8 the grounds that it is vague and ambiguous as to the term "things". Opulent objects  
9 to this request to the extent that it seeks documents protected by attorney client  
10 privilege or is attorney work product. Opulent objects to this request to the extent it  
11 seeks irrelevant information. Opulent objects to this request to the extent that it  
12 seeks documents that are equally available to or are already in the custody, control,  
13 or possession of Ya Ya Logistics.

14 **REQUEST FOR PRODUCTION NO. 38**

15 All DOCUMENTS and things that REFER or RELATE to the allegations in  
16 Paragraph 88 of PLAINTIFF's First Amended Complaint.

17 **RESPONSE TO REQUEST FOR PRODUCTION NO. 38**

18 Opulent objects to this request as overbroad and unduly burdensome,  
19 including with respect to scope and time period. Opulent objects to this request on  
20 the grounds that it is vague and ambiguous as to the term "things". Opulent objects  
21 to this request to the extent that it seeks documents protected by attorney client  
22 privilege or is attorney work product. Opulent objects to this request to the extent it  
23 seeks irrelevant information. Opulent objects to this request to the extent that it  
24 seeks documents that are equally available to or are already in the custody, control,  
25 or possession of Ya Ya Logistics.



1 **REQUEST FOR PRODUCTION NO. 39**

2 All DOCUMENTS and things that REFER or RELATE to the allegations in  
3 Paragraph 89 of PLAINTIFF's First Amended Complaint.

4 **RESPONSE TO REQUEST FOR PRODUCTION NO. 39**

5 Opulent objects to this request as overbroad and unduly burdensome,  
6 including with respect to scope and time period. Opulent objects to this request on  
7 the grounds that it is vague and ambiguous as to the term "things". Opulent objects  
8 to this request to the extent that it seeks documents protected by attorney client  
9 privilege or is attorney work product. Opulent objects to this request to the extent it  
10 seeks irrelevant information. Opulent objects to this request to the extent that it  
11 seeks documents that are equally available to or are already in the custody, control,  
12 or possession of Ya Ya Logistics.

13 **REQUEST FOR PRODUCTION NO. 40**

14 All DOCUMENTS and things that REFER or RELATE to the allegations in  
15 Paragraph 96 of PLAINTIFF's First Amended Complaint.

16 **RESPONSE TO REQUEST FOR PRODUCTION NO. 40**

17 Opulent objects to this request as overbroad and unduly burdensome,  
18 including with respect to scope and time period. Opulent objects to this request on  
19 the grounds that it is vague and ambiguous as to the term "things". Opulent objects  
20 to this request to the extent that it seeks documents protected by attorney client  
21 privilege or is attorney work product. Opulent objects to this request to the extent it  
22 seeks irrelevant information. Opulent objects to this request to the extent that it  
23 seeks documents that are equally available to or are already in the custody, control,  
24 or possession of Ya Ya Logistics.

25 **REQUEST FOR PRODUCTION NO. 41**

26 All DOCUMENTS and things that REFER or RELATE to the allegations in  
27 Paragraph 102 of PLAINTIFF's First Amended Complaint.

28



1 **RESPONSE TO REQUEST FOR PRODUCTION NO. 41**

2 Opulent objects to this request as overbroad and unduly burdensome,  
3 including with respect to scope and time period. Opulent objects to this request on  
4 the grounds that it is vague and ambiguous as to the term “things”. Opulent objects  
5 to this request to the extent that it seeks documents protected by attorney client  
6 privilege or is attorney work product. Opulent objects to this request to the extent it  
7 seeks irrelevant information. Opulent objects to this request to the extent that it  
8 seeks documents that are equally available to or are already in the custody, control,  
9 or possession of Ya Ya Logistics.

10 **REQUEST FOR PRODUCTION NO. 42**

11 All DOCUMENTS and things that REFER or RELATE to the allegations in  
12 Paragraph 103 of PLAINTIFF’s First Amended Complaint.

13 **RESPONSE TO REQUEST FOR PRODUCTION NO. 42**

14 Opulent objects to this request as overbroad and unduly burdensome,  
15 including with respect to scope and time period. Opulent objects to this request on  
16 the grounds that it is vague and ambiguous as to the term “things”. Opulent objects  
17 to this request to the extent that it seeks documents protected by attorney client  
18 privilege or is attorney work product. Opulent objects to this request to the extent it  
19 seeks irrelevant information. Opulent objects to this request to the extent that it  
20 seeks documents that are equally available to or are already in the custody, control,  
21 or possession of Ya Ya Logistics.

22 **REQUEST FOR PRODUCTION NO. 43**

23 All DOCUMENTS and things that REFER or RELATE to the allegations in  
24 Paragraph 104 of PLAINTIFF’s First Amended Complaint.

25 **RESPONSE TO REQUEST FOR PRODUCTION NO. 43**

26 Opulent objects to this request as overbroad and unduly burdensome,  
27 including with respect to scope and time period. Opulent objects to this request on  
28 the grounds that it is vague and ambiguous as to the term “things”. Opulent objects

1 to this request to the extent that it seeks documents protected by attorney client  
2 privilege or is attorney work product. Opulent objects to this request to the extent it  
3 seeks irrelevant information. Opulent objects to this request to the extent that it  
4 seeks documents that are equally available to or are already in the custody, control,  
5 or possession of Ya Ya Logistics.

6 **REQUEST FOR PRODUCTION NO. 44**

7 All DOCUMENTS and things that REFER or RELATE to the allegations in  
8 Paragraph 113 of PLAINTIFF's First Amended Complaint.

9 **RESPONSE TO REQUEST FOR PRODUCTION NO. 44**

10 Opulent objects to this request as overbroad and unduly burdensome,  
11 including with respect to scope and time period. Opulent objects to this request on  
12 the grounds that it is vague and ambiguous as to the term "things". Opulent objects  
13 to this request to the extent that it seeks documents protected by attorney client  
14 privilege or is attorney work product. Opulent objects to this request to the extent it  
15 seeks irrelevant information. Opulent objects to this request to the extent that it  
16 seeks documents that are equally available to or are already in the custody, control,  
17 or possession of Ya Ya Logistics.

18 **REQUEST FOR PRODUCTION NO. 45**

19 All DOCUMENTS and things that REFER or RELATE to the allegations in  
20 Paragraph 114 of PLAINTIFF's First Amended Complaint.

21 **RESPONSE TO REQUEST FOR PRODUCTION NO. 45**

22 Opulent objects to this request as overbroad and unduly burdensome,  
23 including with respect to scope and time period. Opulent objects to this request on  
24 the grounds that it is vague and ambiguous as to the term "things". Opulent objects  
25 to this request to the extent that it seeks documents protected by attorney client  
26 privilege or is attorney work product. Opulent objects to this request to the extent it  
27 seeks irrelevant information. Opulent objects to this request to the extent that it  
28 seeks documents that are equally available to or are already in the custody, control,

1 or possession of Ya Ya Logistics.

2 **REQUEST FOR PRODUCTION NO. 46**

3 All DOCUMENTS and things that REFER or RELATE to the allegations in  
4 Paragraph 121 of PLAINTIFF's First Amended Complaint.

5 **RESPONSE TO REQUEST FOR PRODUCTION NO. 46**

6 Opulent objects to this request as overbroad and unduly burdensome,  
7 including with respect to scope and time period. Opulent objects to this request on  
8 the grounds that it is vague and ambiguous as to the term "things". Opulent objects  
9 to this request to the extent that it seeks documents protected by attorney client  
10 privilege or is attorney work product. Opulent objects to this request to the extent it  
11 seeks irrelevant information. Opulent objects to this request to the extent that it  
12 seeks documents that are equally available to or are already in the custody, control,  
13 or possession of Ya Ya Logistics.

14 **REQUEST FOR PRODUCTION NO. 47**

15 All DOCUMENTS and things that REFER or RELATE to the allegations in  
16 Paragraph 122 of PLAINTIFF's First Amended Complaint.

17 **RESPONSE TO REQUEST FOR PRODUCTION NO. 47**

18 Opulent objects to this request as overbroad and unduly burdensome,  
19 including with respect to scope and time period. Opulent objects to this request on  
20 the grounds that it is vague and ambiguous as to the term "things". Opulent objects  
21 to this request to the extent that it seeks documents protected by attorney client  
22 privilege or is attorney work product. Opulent objects to this request to the extent it  
23 seeks irrelevant information. Opulent objects to this request to the extent that it  
24 seeks documents that are equally available to or are already in the custody, control,  
25 or possession of Ya Ya Logistics.

1 **REQUEST FOR PRODUCTION NO. 48**

2 All DOCUMENTS and things that REFER or RELATE to the allegations in  
3 Paragraph 130 of PLAINTIFF's First Amended Complaint.

4 **RESPONSE TO REQUEST FOR PRODUCTION NO. 48**

5 Opulent objects to this request as overbroad and unduly burdensome,  
6 including with respect to scope and time period. Opulent objects to this request on  
7 the grounds that it is vague and ambiguous as to the term "things". Opulent objects  
8 to this request to the extent that it seeks documents protected by attorney client  
9 privilege or is attorney work product. Opulent objects to this request to the extent it  
10 seeks irrelevant information. Opulent objects to this request to the extent that it  
11 seeks documents that are equally available to or are already in the custody, control,  
12 or possession of Ya Ya Logistics.

13 **REQUEST FOR PRODUCTION NO. 49**

14 All DOCUMENTS and things that REFER or RELATE to the allegations in  
15 Paragraph 131 of PLAINTIFF's First Amended Complaint.

16 **RESPONSE TO REQUEST FOR PRODUCTION NO. 49**

17 Opulent objects to this request as overbroad and unduly burdensome,  
18 including with respect to scope and time period. Opulent objects to this request on  
19 the grounds that it is vague and ambiguous as to the term "things". Opulent objects  
20 to this request to the extent that it seeks documents protected by attorney client  
21 privilege or is attorney work product. Opulent objects to this request to the extent it  
22 seeks irrelevant information. Opulent objects to this request to the extent that it  
23 seeks documents that are equally available to or are already in the custody, control,  
24 or possession of Ya Ya Logistics.

25 **REQUEST FOR PRODUCTION NO. 50**

26 All DOCUMENTS and things that REFER or RELATE to the allegations in  
27 Paragraph 107 of PLAINTIFF's First Amended Complaint.

28

1 **RESPONSE TO REQUEST FOR PRODUCTION NO. 50**

2 Opulent objects to this request as overbroad and unduly burdensome,  
3 including with respect to scope and time period. Opulent objects to this request on  
4 the grounds that it is vague and ambiguous as to the term “things”. Opulent objects  
5 to this request to the extent that it seeks documents protected by attorney client  
6 privilege or is attorney work product. Opulent objects to this request to the extent it  
7 seeks irrelevant information. Opulent objects to this request to the extent that it  
8 seeks documents that are equally available to or are already in the custody, control,  
9 or possession of Ya Ya Logistics.

10 **REQUEST FOR PRODUCTION NO. 51**

11 All DOCUMENTS and things that REFER or RELATE to the allegations in  
12 Paragraph 108 of PLAINTIFF’s First Amended Complaint.

13 **RESPONSE TO REQUEST FOR PRODUCTION NO. 51**

14 Opulent objects to this request as overbroad and unduly burdensome,  
15 including with respect to scope and time period. Opulent objects to this request on  
16 the grounds that it is vague and ambiguous as to the term “things”. Opulent objects  
17 to this request to the extent that it seeks documents protected by attorney client  
18 privilege or is attorney work product. Opulent objects to this request to the extent it  
19 seeks irrelevant information. Opulent objects to this request to the extent that it  
20 seeks documents that are equally available to or are already in the custody, control,  
21 or possession of Ya Ya Logistics.

22 **REQUEST FOR PRODUCTION NO. 52**

23 DOCUMENTS showing all money spent on advertising of the product shown  
24 in U.S. Trademark Reg. No. 5,912,235 in 2006.

25 **RESPONSE TO REQUEST FOR PRODUCTION NO. 52**

26 Opulent objects to this request as overbroad and unduly burdensome,  
27 including with respect to scope and time period. Opulent objects to this request on  
28 the grounds that it is vague and ambiguous as to the phrase “money spent” and

1 “advertising”. Opulent objects to this request to the extent that it seeks documents  
2 protected by attorney client privilege or is attorney work product. Opulent objects to  
3 this request to the extent it seeks irrelevant information. Opulent objects to this  
4 request to the extent that it seeks documents that are equally available to or are  
5 already in the custody, control, or possession of Ya Ya Logistics. Opulent objects to  
6 this request to the extent it seeks confidential or proprietary information.

7 **REQUEST FOR PRODUCTION NO. 53**

8 DOCUMENTS showing all money spent on advertising the product shown in  
9 U.S. Trademark Reg. No. 5,912,235 in 2007.

10 **RESPONSE TO REQUEST FOR PRODUCTION NO. 53**

11 Opulent objects to this request as overbroad and unduly burdensome,  
12 including with respect to scope and time period. Opulent objects to this request on  
13 the grounds that it is vague and ambiguous as to the phrase “money spent” and  
14 “advertising”. Opulent objects to this request to the extent that it seeks documents  
15 protected by attorney client privilege or is attorney work product. Opulent objects to  
16 this request to the extent it seeks irrelevant information. Opulent objects to this  
17 request to the extent that it seeks documents that are equally available to or are  
18 already in the custody, control, or possession of Ya Ya Logistics. Opulent objects to  
19 this request to the extent it seeks confidential or proprietary information.

20 **REQUEST FOR PRODUCTION NO. 54**

21 DOCUMENTS showing all money spent on advertising of the product shown  
22 in U.S. Trademark Reg. No. 5,912,235 in 2008.

23 **RESPONSE TO REQUEST FOR PRODUCTION NO. 54**

24 Opulent objects to this request as overbroad and unduly burdensome,  
25 including with respect to scope and time period. Opulent objects to this request on  
26 the grounds that it is vague and ambiguous as to the phrase “money spent” and  
27 “advertising”. Opulent objects to this request to the extent that it seeks documents  
28 protected by attorney client privilege or is attorney work product. Opulent objects to

1 this request to the extent it seeks irrelevant information. Opulent objects to this  
2 request to the extent that it seeks documents that are equally available to or are  
3 already in the custody, control, or possession of Ya Ya Logistics. Opulent objects to  
4 this request to the extent it seeks confidential or proprietary information.

5 **REQUEST FOR PRODUCTION NO. 55**

6 DOCUMENTS showing all money spent on advertising the product shown in  
7 U.S. Trademark Reg. No. 5,912,235 in 2009.

8 **RESPONSE TO REQUEST FOR PRODUCTION NO. 55**

9 Opulent objects to this request as overbroad and unduly burdensome,  
10 including with respect to scope and time period. Opulent objects to this request on  
11 the grounds that it is vague and ambiguous as to the phrase “money spent” and  
12 “advertising”. Opulent objects to this request to the extent that it seeks documents  
13 protected by attorney client privilege or is attorney work product. Opulent objects to  
14 this request to the extent it seeks irrelevant information. Opulent objects to this  
15 request to the extent that it seeks documents that are equally available to or are  
16 already in the custody, control, or possession of Ya Ya Logistics. Opulent objects to  
17 this request to the extent it seeks confidential or proprietary information.

18 **REQUEST FOR PRODUCTION NO. 56**

19 DOCUMENTS showing all money spent on advertising the product shown in  
20 U.S. Trademark Reg. No. 5,912,235 in 2010.

21 **RESPONSE TO REQUEST FOR PRODUCTION NO. 56**

22 Opulent objects to this request as overbroad and unduly burdensome,  
23 including with respect to scope and time period. Opulent objects to this request on  
24 the grounds that it is vague and ambiguous as to the phrase “money spent” and  
25 “advertising”. Opulent objects to this request to the extent that it seeks documents  
26 protected by attorney client privilege or is attorney work product. Opulent objects to  
27 this request to the extent it seeks irrelevant information. Opulent objects to this  
28 request to the extent that it seeks documents that are equally available to or are



1 already in the custody, control, or possession of Ya Ya Logistics. Opulent objects to  
2 this request to the extent it seeks confidential or proprietary information.

3 **REQUEST FOR PRODUCTION NO. 57**

4 DOCUMENTS showing all money spent on advertising the product shown in  
5 U.S. Trademark Reg. No. 5,912,235 in 2011.

6 **RESPONSE TO REQUEST FOR PRODUCTION NO. 57**

7 Opulent objects to this request as overbroad and unduly burdensome,  
8 including with respect to scope and time period. Opulent objects to this request on  
9 the grounds that it is vague and ambiguous as to the phrase “money spent” and  
10 “advertising”. Opulent objects to this request to the extent that it seeks documents  
11 protected by attorney client privilege or is attorney work product. Opulent objects to  
12 this request to the extent it seeks irrelevant information. Opulent objects to this  
13 request to the extent that it seeks documents that are equally available to or are  
14 already in the custody, control, or possession of Ya Ya Logistics. Opulent objects to  
15 this request to the extent it seeks confidential or proprietary information.

16 **REQUEST FOR PRODUCTION NO. 58**

17 DOCUMENTS showing all money spent on advertising the product shown in  
18 U.S. Trademark Reg. No. 5,912,235 in 2012.

19 **RESPONSE TO REQUEST FOR PRODUCTION NO. 58**

20 Opulent objects to this request as overbroad and unduly burdensome,  
21 including with respect to scope and time period. Opulent objects to this request on  
22 the grounds that it is vague and ambiguous as to the phrase “money spent” and  
23 “advertising”. Opulent objects to this request to the extent that it seeks documents  
24 protected by attorney client privilege or is attorney work product. Opulent objects to  
25 this request to the extent it seeks irrelevant information. Opulent objects to this  
26 request to the extent that it seeks documents that are equally available to or are  
27 already in the custody, control, or possession of Ya Ya Logistics. Opulent objects to  
28 this request to the extent it seeks confidential or proprietary information.



**REQUEST FOR PRODUCTION NO. 59**

DOCUMENTS showing all money spent on advertising the product shown in U.S. Trademark Reg. No. 5,912,235 in 2013.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 59**

Opulent objects to this request as overbroad and unduly burdensome, including with respect to scope and time period. Opulent objects to this request on the grounds that it is vague and ambiguous as to the phrase “money spent” and “advertising”. Opulent objects to this request to the extent that it seeks documents protected by attorney client privilege or is attorney work product. Opulent objects to this request to the extent it seeks irrelevant information. Opulent objects to this request to the extent that it seeks documents that are equally available to or are already in the custody, control, or possession of Ya Ya Logistics. Opulent objects to this request to the extent it seeks confidential or proprietary information.

**REQUEST FOR PRODUCTION NO. 60**

Representative samples of each of PLAINTIFF’S products bearing PLAINTIFF’S ALLEGED TRADE DRESS.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 60**

Opulent objects to this request as overbroad and unduly burdensome, including with respect to scope and time period. Opulent objects to this request on the grounds that it is vague and ambiguous as to the phrase “representative samples”. Opulent objects to this request to the extent that it seeks documents that are equally available to or are already in the custody, control, or possession of Ya Ya Logistics.

**REQUEST FOR PRODUCTION NO. 61**

DOCUMENTS sufficient to identify the technical specifications and product dimensions of each of PLAINTIFF’S products bearing PLAINTIFF’S ALLEGED TRADE DRESS including the technical specifications and product dimensions of

1 each component of each of PLAINTIFF's products bearing PLAINTIFF'S  
2 ALLEGED TRADE DRESS.

3 **RESPONSE TO REQUEST FOR PRODUCTION NO. 61**

4 Opulent objects to this request as overbroad and unduly burdensome,  
5 including with respect to scope and time period. Opulent objects to this request on  
6 the grounds that it is vague and ambiguous as to the phrases "sufficient", "technical  
7 specifications" and "product dimensions". Opulent objects to this request to the  
8 extent that it seeks documents that are equally available to or are already in the  
9 custody, control, or possession of Ya Ya Logistics.

10 **REQUEST FOR PRODUCTION NO. 62**

11 Representative samples of all marketing, promotional, or advertising  
12 materials for all of PLAINTIFF's products bearing PLAINTIFF'S ALLEGED  
13 TRADE DRESS, whether prepared by PLAINTIFF or on PLAINTIFF's behalf.

14 **RESPONSE TO REQUEST FOR PRODUCTION NO. 62**

15 Opulent objects to this request as overbroad and unduly burdensome,  
16 including with respect to scope and time period. Opulent objects to this request on  
17 the grounds that it is vague and ambiguous as to the phrase "representative  
18 samples". Opulent objects to this request to the extent that it seeks documents that  
19 are equally available to or are already in the custody, control, or possession of Ya  
20 Ya Logistics.

21 **REQUEST FOR PRODUCTION NO. 63**

22 DOCUMENTS sufficient to show all contents of any websites, including  
23 websites at www.opulenttreasures.com, through which PLAINTIFF promoted,  
24 marketed, sold, licensed, provided, or distributed PLAINTIFF's products bearing  
25 PLAINTIFF'S ALLEGED TRADE DRESS, including screen shots or printouts of  
26 web pages.

27 **RESPONSE TO REQUEST FOR PRODUCTION NO. 63**

28 Opulent objects to this request as overbroad and unduly burdensome,

1 including with respect to scope and time period. Opulent objects to this request on  
2 the grounds that it is vague and ambiguous as to the phrases “sufficient”,  
3 “promoted”, “marketed”, “sold”, “licensed”, “provided”, and “distributed”. Opulent  
4 objects to this request to the extent that it seeks documents that are equally available  
5 to or are already in the custody, control, or possession of Ya Ya Logistics.

6 **REQUEST FOR PRODUCTION NO. 64**

7 DOCUMENTS and things sufficient to show all of PLAINTIFF’s marketing,  
8 advertising, and promotional activities under or in connection with PLAINTIFF’S  
9 ALLEGED TRADE DRESS, including without limitation print, radio, and  
10 television advertising; attendance at trade shows or seminars; and advertising or  
11 promotion over the Internet (including without limitation keyword advertising and  
12 promotion through social networking sites such as Facebook or Twitter).

13 **RESPONSE TO REQUEST FOR PRODUCTION NO. 64**

14 Opulent objects to this request as overbroad and unduly burdensome,  
15 including with respect to scope and time period. Opulent objects to this request on  
16 the grounds that it is vague and ambiguous as to the phrases “things sufficient”,  
17 “marketing”, “advertising” and “promotional activities”. Opulent objects to this  
18 request to the extent that it seeks documents that are equally available to or are  
19 already in the custody, control, or possession of Ya Ya Logistics.

20 **REQUEST FOR PRODUCTION NO. 65**

21 All press releases or press kits that REFER or RELATE to the PLAINTIFF’s  
22 products bearing PLAINTIFF’S ALLEGED TRADE DRESS.

23 **RESPONSE TO REQUEST FOR PRODUCTION NO. 65**

24 Opulent objects to this request as overbroad and unduly burdensome,  
25 including with respect to time period. Opulent objects to this request on the grounds  
26 that it is vague and ambiguous as to the phrases “press releases” and “press kits”.  
27 Opulent objects to this request to the extent it seeks irrelevant information. Opulent  
28 objects to this request to the extent that it seeks documents that are equally available

1 to or are already in the custody, control, or possession of Ya Ya Logistics.

2 **REQUEST FOR PRODUCTION NO. 66**

3 All DOCUMENTS reflecting any trade shows, conferences, conventions, or  
4 similar events which PLAINTIFF has attended or sponsored, in which  
5 PLAINTIFF's products bearing PLAINTIFF'S ALLEGED TRADE DRESS have  
6 been featured.

7 **RESPONSE TO REQUEST FOR PRODUCTION NO. 66**

8 Opulent objects to this request as overbroad and unduly burdensome,  
9 including with respect to scope and time period. Opulent objects to this request on  
10 the grounds that it is vague and ambiguous as to the phrases "trade shows",  
11 "conferences", "conventions" and "featured". Opulent objects to this request to the  
12 extent it seeks irrelevant information. Opulent objects to this request to the extent  
13 that it seeks documents that are equally available to or are already in the custody,  
14 control, or possession of Ya Ya Logistics.

15 **REQUEST FOR PRODUCTION NO. 67**

16 DOCUMENTS sufficient to identify all channels of trade through which  
17 PLAINTIFF has offered, sold, licensed, distributed, or provided PLAINTIFF's  
18 products bearing PLAINTIFF'S ALLEGED TRADE DRESS, including all such  
19 channels of trade used in the United States.

20 **RESPONSE TO REQUEST FOR PRODUCTION NO. 67**

21 Opulent objects to this request as overbroad and unduly burdensome,  
22 including with respect to scope and time period. Opulent objects to this request on  
23 the grounds that it is vague and ambiguous as to the phrases "sufficient" and  
24 "channels of trade". Opulent objects to this request to the extent it seeks irrelevant  
25 information. Opulent objects to this request to the extent that it seeks documents that  
26 are equally available to or are already in the custody, control, or possession of Ya  
27 Ya Logistics.

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1 **REQUEST FOR PRODUCTION NO. 68**

2 All DOCUMENTS and things concerning surveys or studies concerning  
3 PLAINTIFF's products bearing PLAINTIFF'S ALLEGED TRADE DRESS,  
4 including without limitation marketing, purchasing, brand awareness, or other  
5 studies to determine the familiarity of the public with PLAINTIFF's products,  
6 company, or brand.

7 **RESPONSE TO REQUEST FOR PRODUCTION NO. 68**

8 Opulent objects to this request as overbroad and unduly burdensome,  
9 including with respect to scope and time period. Opulent objects to this request on  
10 the grounds that it is vague and ambiguous as to the terms "surveys" and "studies".  
11 Opulent objects to this request to the extent that it seeks documents protected by  
12 attorney client privilege or is attorney work product. Opulent objects to this request  
13 to the extent it seeks irrelevant information. Opulent objects to this request to the  
14 extent that it seeks documents that are equally available to or are already in the  
15 custody, control, or possession of Ya Ya Logistics. Opulent objects to this request to  
16 the extent it seeks confidential or proprietary information.

17 **REQUEST FOR PRODUCTION NO. 69**

18 All DOCUMENTS that describe, indicate, propose, or assess the measures or  
19 actions, if any, to be taken by or on behalf of PLAINTIFF as a result of any survey  
20 or study referred to in Request No. 62.

21 **RESPONSE TO REQUEST FOR PRODUCTION NO. 69**

22 Opulent objects to this request as overbroad and unduly burdensome,  
23 including with respect to scope and time period. Opulent objects to this request on  
24 the grounds that it is vague and ambiguous as to the terms "measures" or "actions".  
25 Opulent objects to this request to the extent that it seeks documents protected by  
26 attorney client privilege or is attorney work product.

1 **REQUEST FOR PRODUCTION NO. 70**

2 All DOCUMENTS commemorating, reporting, recording, referring to or  
3 mentioning customer comments, complaints, or requests regarding PLAINTIFF's  
4 products bearing PLAINTIFF'S ALLEGED TRADE DRESS.

5 **RESPONSE TO REQUEST FOR PRODUCTION NO. 70**

6 Opulent objects to this request as overbroad and unduly burdensome,  
7 including with respect to scope and time period. Opulent objects to this request on  
8 the grounds that it is vague and ambiguous as to the terms "comments",  
9 "complaints" and requests". Opulent objects to this request to the extent that it seeks  
10 documents protected by attorney client privilege or is attorney work product.  
11 Opulent objects to the extent it is violative of third-party privacy rights.

12 **REQUEST FOR PRODUCTION NO. 71**

13 DOCUMENTS sufficient to show PLAINTIFF's organizational structure  
14 from 1995 to the present, including without limitation charts or lists of your  
15 managers, officers, directors, employees, consultants, contractors, or attorneys.

16 **RESPONSE TO REQUEST FOR PRODUCTION NO. 71**

17 Opulent objects to this request as overbroad and unduly burdensome,  
18 including with respect to scope and time period. Opulent objects to this request on  
19 the grounds that it is vague and ambiguous as to the terms "sufficient" and  
20 "organizational structure". Opulent objects to this request to the extent it seeks  
21 irrelevant information.

22 **REQUEST FOR PRODUCTION NO. 72**

23 DOCUMENTS sufficient to show the ownership interest, assignment interest,  
24 security interest, or other interest held in PLAINTIFF.

25 **RESPONSE TO REQUEST FOR PRODUCTION NO. 72**

26 Opulent objects to this request as overbroad and unduly burdensome,  
27 including with respect to scope and time period. Opulent objects to this request on  
28 the grounds that it is vague and ambiguous as to the terms "sufficient" and

1 “ownership interest”. Opulent objects to this request to the extent it seeks irrelevant  
2 information.

3 **REQUEST FOR PRODUCTION NO. 73**

4 All DOCUMENTS and things relating to this lawsuit, including any  
5 communications between you and any other person concerning this lawsuit.

6 **RESPONSE TO REQUEST FOR PRODUCTION NO. 73**

7 Opulent objects to this request as overbroad and unduly burdensome,  
8 including with respect to scope and time period. Opulent objects to this request on  
9 the grounds that it is vague and ambiguous as to the terms “things” and  
10 “communications”. Opulent objects to this request to the extent that it seeks  
11 documents protected by attorney client privilege or is attorney work product.  
12 Opulent objects to this request to the extent it seeks irrelevant information. Opulent  
13 objects to this request to the extent that it seeks documents that are equally available  
14 to or are already in the custody, control, or possession of Ya Ya Logistics.

15 **REQUEST FOR PRODUCTION NO. 74**

16 All DOCUMENTS and things identified in PLAINTIFF’s responses to any  
17 Interrogatories in this lawsuit, including any amended or supplemental responses.

18 **RESPONSE TO REQUEST FOR PRODUCTION NO. 74**

19 Opulent objects to this request to the extent that it seeks documents protected  
20 by attorney client privilege or is attorney work product. Opulent objects to this  
21 request to the extent it seeks irrelevant information. Opulent objects to this request  
22 to the extent that it seeks documents that are equally available to or are already in  
23 the custody, control, or possession of Ya Ya Logistics.

24 **REQUEST FOR PRODUCTION NO. 75**

25 All DOCUMENTS and things identified in PLAINTIFF’s Initial Disclosures,  
26 including any amended or supplemental Initial Disclosures.

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1 **RESPONSE TO REQUEST FOR PRODUCTION NO. 75**

2 Opulent objects to this request to the extent that it seeks documents protected  
3 by attorney client privilege or is attorney work product. Opulent objects to this  
4 request to the extent it seeks irrelevant information. Opulent objects to this request  
5 to the extent that it seeks documents that are equally available to or are already in  
6 the custody, control, or possession of Ya Ya Logistics.

7 **REQUEST FOR PRODUCTION NO. 76**

8 All DOCUMENTS and things that PLAINTIFF intends to introduce or rely  
9 on in connection with this lawsuit.

10 **RESPONSE TO REQUEST FOR PRODUCTION NO. 76**

11 Opulent objects to this request on the grounds that it is premature insofar as  
12 discovery is still ongoing. Opulent will produce all non-privileged, responsive  
13 documents at a later date.

14 **REQUEST FOR PRODUCTION NO. 77**

15 DOCUMENTS sufficient to show for each year from 2011 to the present the  
16 revenues earned from and expenses related to the offering for sale, sale, licensing,  
17 provision, or distribution of each of PLAINTIFF's products bearing PLAINTIFF'S  
18 ALLEGED TRADE DRESS, including advertising, promotion, and marketing  
19 expenses.

20 **RESPONSE TO REQUEST FOR PRODUCTION NO. 77**

21 Opulent objects to this request as overbroad and unduly burdensome,  
22 including with respect to scope and time period. Opulent objects to this request on  
23 the grounds that it is vague and ambiguous as to the terms "revenues" and  
24 "expenses". Opulent objects to this request to the extent that it seeks documents  
25 protected by attorney client privilege or is attorney work product. Opulent objects to  
26 this request to the extent it seeks confidential or proprietary information.

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1 **REQUEST FOR PRODUCTION NO. 78**

2 All price lists and web pages discussing pricing for PLAINTIFF's products  
3 bearing PLAINTIFF'S ALLEGED TRADE DRESS.

4 **RESPONSE TO REQUEST FOR PRODUCTION NO. 78**

5 Opulent objects to this request as overbroad and unduly burdensome,  
6 including with respect to scope and time period. Opulent objects to this request on  
7 the grounds that it is vague and ambiguous as to the phrases "price lists" and "web  
8 pages". Opulent objects to this request to the extent it seeks irrelevant information.  
9 Opulent objects to this request to the extent that it seeks documents that are equally  
10 available to or are already in the custody, control, or possession of Ya Ya Logistics.

11 **REQUEST FOR PRODUCTION NO. 79**

12 DOCUMENTS sufficient to show actual sales of each of PLAINTIFF's  
13 products bearing PLAINTIFF'S ALLEGED TRADE DRESS made, used, licensed,  
14 distributed, supplied, sold, or offered for sale in the United States, or imported into  
15 the United States, on a monthly, quarterly, and annual basis, including but not  
16 limited to documents concerning or relating to:

- 17 a) Unit sales;  
18 b) Revenue from sales;  
19 c) Profits from sales, including both gross and net profits;  
20 d) Costs from sales, including cost of goods sold and allocated costs;  
21 e) Margins, including both gross and net;  
22 f) Pricing; and  
23 g) Customers. .

24 **RESPONSE TO REQUEST FOR PRODUCTION NO. 79**

25 Opulent objects to this request as overbroad and unduly burdensome,  
26 including with respect to scope and time period. Opulent objects to this request on  
27 the grounds that it is vague and ambiguous as to the term "sufficient" and "actual  
28 sales". Opulent objects to this request to the extent it seeks confidential or

1 proprietary information. Opulent objects to this request to the extent it seeks  
2 irrelevant information.

3 **REQUEST FOR PRODUCTION NO. 80**

4 DOCUMENTS sufficient to show YOUR document control and retention  
5 policies.

6 **RESPONSE TO REQUEST FOR PRODUCTION NO. 80**

7 Opulent objects to this request as overbroad and unduly burdensome,  
8 including with respect to scope and time period. Opulent objects to this request on  
9 the grounds that it is vague and ambiguous as to the terms “sufficient”, “document  
10 control” and “retention”. Opulent objects to this request to the extent it seeks  
11 irrelevant information.

12 **REQUEST FOR PRODUCTION NO. 81**

13 DOCUMENTS that evidence facts or data that any of YOUR testifying  
14 experts considered in forming his or her opinions for this case.

15 **RESPONSE TO REQUEST FOR PRODUCTION NO. 81**

16 Opulent objects to this request on the grounds that the request is premature as  
17 discovery is ongoing. Opulent objects to this request to the extent that it seeks  
18 documents protected by attorney client privilege or is attorney work product.

19 **REQUEST FOR PRODUCTION NO. 82**

20 DOCUMENTS that evidence assumptions that any of YOUR testifying  
21 experts relied on in forming his or her opinions for this opinions for this case.

22 **RESPONSE TO REQUEST FOR PRODUCTION NO. 82**

23 Opulent objects to this request on the grounds that the request is premature as  
24 discovery is ongoing. Opulent objects to this request to the extent that it seeks  
25 documents protected by attorney client privilege or is attorney work product.  
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1 **REQUEST FOR PRODUCTION NO. 83**

2 DOCUMENTS that evidence assumptions that any of YOUR testifying  
3 experts relied on in forming his or her opinions for this opinions for this case.

4 **RESPONSE TO REQUEST FOR PRODUCTION NO. 83**

5 Opulent objects to this request on the grounds that the request is premature as  
6 discovery is ongoing. Opulent objects to this request to the extent that it seeks  
7 documents protected by attorney client privilege or is attorney work product.  
8 Opulent objects to this request on the grounds that it is duplicative of prior requests.

9 **REQUEST FOR PRODUCTION NO. 84**

10 DOCUMENTS that evidence communications relating to this case between  
11 any of YOUR testifying experts and any person.

12 **RESPONSE TO REQUEST FOR PRODUCTION NO. 84**

13 Opulent objects to this request as overbroad and unduly burdensome,  
14 including with respect to scope and time period. Opulent objects to this request on  
15 the grounds that it is vague and ambiguous as to the term “communications”.  
16 Opulent objects to this request on the grounds that the request is premature as  
17 discovery is ongoing. Opulent objects to this request to the extent that it seeks  
18 documents protected by attorney client privilege or is attorney work product.

19 **REQUEST FOR PRODUCTION NO. 85**

20 DOCUMENTS that YOU intend to use as exhibits at trial.

21 **RESPONSE TO REQUEST FOR PRODUCTION NO. 85**

22 Opulent objects to this request on the grounds that the request is premature as  
23 discovery is ongoing. Opulent objects to this request to the extent that it seeks  
24 documents protected by attorney client privilege or is attorney work product.

25 **REQUEST FOR PRODUCTION NO. 86**

26 All DOCUMENTS and THINGS relating to documents submitted to the U.S.  
27 Patent and Trademark Office with regard to U.S. Trademark Registration No.

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1 5,912,235, including but not limited to all communications with counsel and third  
2 parties, and all drafts of any submitted documents.

3 **RESPONSE TO REQUEST FOR PRODUCTION NO. 86**

4 Opulent objects to this request as overbroad and unduly burdensome,  
5 including with respect to scope and time period. Opulent objects to this request on  
6 the grounds that it is vague and ambiguous as to the terms “THINGS” and  
7 “communications”. Opulent objects to this request to the extent that it seeks  
8 documents protected by attorney client privilege or is attorney work product.  
9 Opulent objects to this request to the extent that it seeks documents that are equally  
10 available to or are already in the custody, control, or possession of Ya Ya Creations.  
11 Opulent objects to this request to the extent it seeks confidential or proprietary  
12 information.

13 **REQUEST FOR PRODUCTION NO. 87**

14 All DOCUMENTS and THINGS relating to when YOU first became aware  
15 of any Lamps Plus product that has at any time competed with any Opulent product  
16 having the trade dress shown in U.S. Trademark Registration No. 5,912,235.

17 **RESPONSE TO REQUEST FOR PRODUCTION NO. 87**

18 Opulent objects to this request as overbroad and unduly burdensome,  
19 including with respect to scope and time period. Opulent objects to this request on  
20 the grounds that it is vague and ambiguous as to the phrases “first became aware”  
21 and “competed”. Opulent objects to this request to the extent that it seeks documents  
22 protected by attorney client privilege or is attorney work product.

23 **REQUEST FOR PRODUCTION NO. 88**

24 All DOCUMENTS and THINGS relating to when YOU first became aware  
25 of any third party selling products that YOU contend infringe the trade dress shown  
26 in U.S. Trademark Registration No. 5,912,235.

27 **RESPONSE TO REQUEST FOR PRODUCTION NO. 88**

28 Opulent objects to this request as overbroad and unduly burdensome,

1 including with respect to scope and time period. Opulent objects to this request on  
2 the grounds that it is vague and ambiguous as to the phrase “first became aware”.  
3 Opulent objects to this request to the extent that it seeks documents protected by  
4 attorney client privilege or is attorney work product.

5 **REQUEST FOR PRODUCTION NO. 89**

6 DOCUMENTS showing all sales of the product shown in U.S. Trademark  
7 Reg. No. 5,912,235 in 2006.

8 **RESPONSE TO REQUEST FOR PRODUCTION NO. 89**

9 Opulent objects to this request as overbroad and unduly burdensome,  
10 including with respect to scope and time period. Opulent objects to this request to  
11 the extent it seeks confidential or proprietary information.

12 **REQUEST FOR PRODUCTION NO. 90**

13 DOCUMENTS showing all sales of the product shown in U.S. Trademark  
14 Reg. No. 5,912,235 in 2007.

15 **RESPONSE TO REQUEST FOR PRODUCTION NO. 90**

16 Opulent objects to this request as overbroad and unduly burdensome,  
17 including with respect to scope and time period. Opulent objects to this request to  
18 the extent it seeks confidential or proprietary information.

19 **REQUEST FOR PRODUCTION NO. 91**

20 All DOCUMENTS and THINGS relating to each of the applications for U.S.  
21 Copyright registration Nos. VA 2-298-980, VA 2-299-360, VA 2-299-364, VA 2-  
22 299-366, VA 2-304-222, VA 2-308-419, VA 2-309-157 and VA 2-315-469.

23 **RESPONSE TO REQUEST FOR PRODUCTION NO. 91**

24 Opulent objects to this request as overbroad and unduly burdensome,  
25 including with respect to scope and time period. Opulent objects to this request on  
26 the grounds that it is vague and ambiguous as to the term “THINGS”. Opulent  
27 objects to this request to the extent that it seeks documents protected by attorney  
28 client privilege or is attorney work product. Opulent objects to this request to the

1 extent it seeks irrelevant information. Opulent objects to this request to the extent  
2 that it seeks documents that are equally available to or are already in the custody,  
3 control, or possession of Ya Ya Logistics. Opulent objects to this request to the  
4 extent it seeks confidential or proprietary information.

5 **REQUEST FOR PRODUCTION NO. 92**

6 All of YOUR tax returns from 2006 to the present.

7 **RESPONSE TO REQUEST FOR PRODUCTION NO. 92**

8 Opulent objects to this request as overbroad and unduly burdensome,  
9 including with respect to scope and time period. Opulent objects to this request to  
10 the extent it seeks irrelevant information. Opulent objects to this request to the  
11 extent it seeks confidential or proprietary information.

12 Dated: November 27, 2023

Respectfully submitted,

13 By: /s/ Samantha Parrish

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